1   mentioned a moment ago, all aware of

2   the content of your letter before it

3   was sent?

4 A. Yes, sir.

5 Q. So, the people who knew of the content

6   of your letter before it was mailed

7   included general counsel for the OCME,

8   is that right?

9 A. Yes, sir.

10 Q. And it included the human resources

11   director for the OCME?

12 A. Yes, sir.

13 Q. And it included another human resources

14   director?

15 A. Yes, sir.

16 Q. And who was that?

17 A. The executive office of public safety.

18 Q. Who specifically was that?

19 A. Irma Gutierrez.

20 Q. Now, did this collaboration include

21   face-to-face meetings, or was it all

22   over the phone or by e-mail? How did

23   the collaboration come about?

24 A. Both.

34

1   Q.   Just talking about face-to-face meetings

2   right now, do you remember how many

3   there were relating to terminating

4   Dr. Philip?

5   A.   I believe there was one meeting, sir.

6   Q.   And who do you recall was in that

7   meeting?

8   A.   The chief of staff for the executive

9   office of public safety, the

10   undersecretary to which this agency

11   reported, the human resources directors

12   for the CME, and the executive office

13   of public safety. Dr. Richard Evans, I

14   believe, was there, the general counsel

15   for our agent.

16   Q.   That's Miss Faherty?

17   A.   That's right. I believe that's it, sir,

18   that I recall.

19   Q.   During that meeting was there any

20   discussion of any letters that Dr. Philip

21   had sent to Governor Romney?

22   A.   Yes, sir.

23   Q.   What was that discussion?

24   A.   As I recall, folks were notified that

1   correspondence had been sent both to

2   our agency as well as apparently mailed

3   to Governor Romney. There was some

4   discussion as to what the content was

5   of those two letters. But other than

6   that, it was just general information.

7 Q. Did anyone discuss whether there might

8   be some first amendment issues if Dr.

9   Philip was terminated after sending

10   those letters to Governor Romney?

11   MS. KELLEY: Objection to form,

12   but you may answer..

13 A. No, sir.

14 Q. So, no one among the people that you have

15   named, or the positions that you have

16   named expressed any first amendment

17   concerns?

18   MS. KELLEY: Objection to

19   form. You may answer..

20 A. No, sir.

21 Q. In your view, what were the reasons for

22   the termination of Dr. Philip's contract?

23 A. Dr. Philip's contract, I believe, had

24   mentioned in the job duties that he was

1   to be a role model for other medical

2   examiners, employees of the chief medical

3   examiner's office. As a result of his

4   actions with the correspondence with

5   the district attorney on that case that

6   I mentioned, it was determined that he

7   had violated that term of his contract.

8 Q. So, was this correspondence with the

9   district attorney the sole act that

10   led to the termination of his contract?

11   MS. KELLEY: Objection to form,

12   but you may answer.

13 A. No, sir.

14 Q. What else, what other acts on the part

15   of Dr. Philip contributed to the

16   termination of his contract?

17 A. The collaboration amongst the folks that

18   we discussed this issue with involved the

19   consideration of his actions. Prior to

20   this event involving his signature on

21   a death certificate where he allegedly,

22   or somehow put blood on the death

23   certificate, and handed it to a member

24   of our administrative staff. As a

1   result of his actions in that case, he

2   was disciplined.

3   Q. So, you've mentioned so far

4   correspondence with the district

5   attorney, and the signature -- the bloody

6   signature, we'll say for lack of a better

7   phrase. Were there any other actions

8   by Dr. Philip that contributed to the

9   termination of his contract?

10 A. No, sir.

11 Q. Can you describe, as best you recall it,

12   this correspondence with the district

13   attorney?

14 A. It was an e-mail regarding, I believe, a

15   juvenile or child case that Dr. Philip

16   was working on. It was correspondence

17   between himself and a district attorney

18   covering that case. Dr. Philip, as I

19   recall, in his e-mail responded back to

20   the district attorney that he did not

21   want his actions involved in this case

22   to be misconstrued or misinterpreted by

23   anyone lest he be accused of farting

24   or urinating on the case folder. That's